

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**THIRD SET OF INFORMATION REQUESTS  
TO WESTERN MASSACHUSETTS ELECTRIC COMPANY  
D.T.E. 03-5**

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Pursuant to 220 C.M.R. 1.06(6)(c), the Department of Telecommunications and Energy ("Department") submits to Western Massachusetts Electric Company ("WMECo" or "Company") the following information requests.

**INSTRUCTIONS**

The following instructions apply to this set of information requests and all subsequent information requests issued by the Department to Massachusetts Electric Company in this proceeding.

1. "WMECo" or "Company" means Western Massachusetts Electric Company, its officers, directors, employees, consultants, and attorneys.
2. "Company's Filing" or "Filing" means all the documents the Company filed and which the Department reviews in this proceeding.
3. Each request should be answered in writing on a separate page with a recitation of the request, and with a reference to the request number, the docket number of the case, and the name of the person responsible for the answer.
4. Please do not wait for all answers to be completed before supplying answers, but instead please provide the answers as they are completed.
5. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witnesses receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
6. The phrase "provide complete and detailed documentation" means provide all data, assumptions, and calculations on which the response relies; provide the source of and basis for all data and assumptions employed; include all studies, reports, and planning documents from which data, estimates, or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates; and provide and explain all supporting workpapers.

7. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources, and other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
8. If the Company finds that any of these requests is ambiguous, please notify the hearing officer so that the requests can be clarified prior to the preparation of a written response.
9. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department. Please also submit the responses directly to: (1) Michael Killion, Hearing Officer; and (2) Robert Harrold, Electric Power Division.

### **INFORMATION REQUESTS**

DTE-3-1 Please refer to the Western Massachusetts Electric Company 1999 Energy Efficiency Annual Report, Table 4A Planned Expenditures, and:

(a) Confirm that the amount of the shareholder incentive being sought for the 1998 program year is \$240,000 as shown in the Performance Incentive column of Table 4A; and

(b) Explain whether the \$240,000 shareholder incentive payment was calculated under the method described in the Amended Settlement approved by the Department in D.P.U./D.T.E. 97-106/120, at 9-11 (February 12, 1998) or some other method.

DTE-3-2 Please refer to the Western Massachusetts Electric Company 2000 Energy Efficiency Annual Report, Table 5B Market Penetration, and:

(a) Confirm that the data shown in Table 5B refers to the Company's 1999 energy efficiency program year; and

(b) confirm that the amount of the shareholder incentive being sought for the 1999 program year is \$1,331,592 as shown on Table 5B; and

(c) explain whether the \$1,331,592 shareholder incentive payment was calculated under the method described in the Amended Settlement approved by

the Department in D.P.U./D.T.E. 97-106/120, at 9-11 (February 12, 1998) or some other method.

DTE-3-3 Please refer to the Western Massachusetts Electric Company 2001 Energy Efficiency Annual Report, Table 5B Market Penetration, and:

(a) Confirm that the data shown in Table 5B refers to the Company's 2000 energy efficiency program year; and

(b) Confirm that the amount of the shareholder incentive being sought for the 2000 program year is \$596,879 as shown on Table 5B; and

(c) explain whether the \$596,879 shareholder incentive payment was calculated under the Department's 98-100 Guidelines or some other method.

DTE-3-4 Please refer to the Western Massachusetts Electric Company 2001 Energy Efficiency Annual Report, Table 4 Program Expenditures. The column entitled Performance Incentives shows the following:

1998	\$240,000
1999	\$856,000
2000	\$1,978,000

Please reconcile any differences between these figures and the shareholder incentive payments being sought by the Company in this proceeding.